

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

CASE NO: 11-05660 BKT

JAVIER ANTONIO QUIÑONES OLMO
LYMARIS LOZADA RIVERA

DEBTORS

REPLY TO TRUSTEE'S RECOMMENDATION

TO THE HONORABLE COURT:

Comes now, Debtors, **JAVIER ANTONIO QUIÑONES OLMO and LYMARIS LOZADA RIVERA**, through the undersigned attorney and very respectfully allege and pray:

1. The Trustee filed on January 3, 2011 an unfavorable recommendation of the plan of this case alleging that the provision for the payment of the creditors secured by Debtor's motor vehicles did not in take into consideration the payment of the insurance premiums over said vehicles.
2. Trustee is correct. Therefore, yesterday we filed an amended plan to correct the error.

WHEREFORE, Debtors respectfully request that this Honorable Court takes notice of the above mentioned and confirms the Amended Chapter 13 Plan of January 2, 2012 at the hearing set for January 13, 2012.

In San Juan Puerto Rico this 3rd day of January, 2012.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this same day a true and exact copy of the present motion will be electronically filed using the CM/ECF System which will send notification of such filing to: Assistant US Trustee, Ms. Monsita Lecaroz Arribas, Esq. to the Chapter 13 Trustee, Mr. Alejandro Oliveras Rivera, Esq. and to all CM/ECF participants whom are creditors and/or interest parties in the present case.

/s/ Eva Margarita Cortes Vazquez

USDC- 200203

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